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June 7, 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Re: FCC En Banc Hearing on Children's Television (MM Docket No. 93-48), June 28, 1994

Dear Mr. Caton:

In connection with the appearance of Jeanette B. Trias, President, ABC Children's Entertainment, at the en banc hearing, I am enclosing an original and nine copies of Ms. Trias' prepared remarks along with a summary, speaker biography and description of Capital Cities/ABC, Inc.

By copy of this letter, I am submitting 21 copies of the same materials to the Video Services division.

Very truly yours,

Sam Antar

SA/ak
Enclosures

cc: Mr. Larry A. Miller
Video Services Division
Mass Media Bureau
Federal Communications Commission
1919 M Street, N.W. - Room 702
Washington, DC 20554

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FCC En Banc Hearing
on Children's Television
(MM Docket No. 93-48)

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Prepared Remarks of
Jeanette B. Trias,
President, ABC Children's Entertainment,
ABC Television Network
Capital Cities/ABC, Inc.

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Speaker Biography

Jeanette Trias, President, ABC Children's Entertainment

Jennie Trias was named President, ABC Children's Entertainment, in March, 1993. She is responsible for overseeing the development and production of all children's series and specials. Ms. Trias reports to Robert A. Iger, President, ABC Television Network Group.

Ms. Trias joined ABC in October, 1978, as Program Coordinator; and was named Supervisor, Current Children's Programs, in January, 1980. In May, 1981, she was named Manager, Children's Programs, West Coast; and in March, 1983, she was promoted to Director, Children's Programs, West Coast. In November, 1986, she was named Vice President, Children's Programs, ABC Television Network Group.

Prior to joining ABC, Ms. Trias worked for the Executive Producer of "ABC Weekend Specials" at ABC Circle Films and Filmmation Studios. While at Filmmation, she was involved in the production of both live action and animated children's programs.

Mr. Trias is a graduate of Marquette University and lives in Studio City, California.

Description of Organization

Capital Cities/ABC, Inc.

Capital Cities/ABC owns and operates the ABC Television Network as well as eight television stations and 19 radio stations. The ABC Television Network supplies its affiliates with five hours of regularly scheduled children's programs on Saturday mornings. The network also broadcasts "The ABC Afterschool Specials", a periodic series designed for children 12-16.

Summary of Prepared Remarks of Jeanette B. Trias, President, ABC
Children's Entertainment

The Commission's current definition of "educational and informational" programming is the right one. The "specifically designed" standard is concrete enough to guide broadcasters in fulfilling their responsibilities under the Children's Act, and at the same time flexible enough to allow producers and broadcasters the freedom to respond in creative and diverse ways to the programming challenge. The alternative definition that the Commission proposed in its Notice of Inquiry -- that a program must have education as a "primary objective" with entertainment as a "secondary goal" would undermine the goals of creativity and diversity.

Effective educational programming must first reach before it can teach. If a program is lacking in entertainment value, not enough children will watch to attract the advertising revenue necessary for commercial survival. And it is not just a matter of money. A program is not effective in teaching unless children are attentive to what they are watching. Children pay more attention when their emotions are engaged by strong characters, good stories and the utilization of entertainment techniques such as music, sound effects and eye-catching graphics.

A standard that allows for the use of entertainment techniques will not open the floodgates to entertainment programs that merely tack on a pro-social message. Under the current standard, a program must be "specifically designed" to serve an educational need. That means the broadcaster must be able to demonstrate that the program had a clearly articulated plan to achieve an educational goal. The Commission can test the broadcaster's good

faith by asking what the educational plan is and what steps were taken to ensure it is carried out. "Specifically designed" is a much more objective standard than "primary purpose". Under a "primary purpose" standard, the Commission would find itself screening programs to decide whether the educational content is enough to make it "primary" or whether the entertainment component is too significant. That kind of decision-making would raise serious concerns of improper government oversight.

Some critics say that serving children's social or emotional needs is not really educational. They would have the FCC narrow the definition so that only instructional programs would qualify. The American Academy of Pediatrics has said that efforts to promote pro-social behavior to children are essential. We agree. There are many examples of legitimate pro-social programs that deserve educational credit. Perhaps the best known is the ABC Afterschool Special series which deals with social and emotional issues of vital concern to teenagers.

The Commission would propose to reduce the credit it now gives to short-form educational programming. That would be a mistake. The short-form has many advantages in serving children's educational needs. For one thing, the length of a short-form segment better matches the attention span of young children. Second, short-forms that are inserted in high-rated entertainment programs reach more children than standard length educational programs. Finally, short-forms can be a very effective educational tool. ABC Schoolhouse Rock is a very good example.

Prepared Remarks of Jeanette B. Trias, President, ABC Children's
Entertainment

My name is Jennie Trias and I am President of ABC Children's Entertainment for the ABC Television Network of Capital Cities/ABC, Inc. I would like to tell you why I believe that the Commission's current definition of "educational and informational" programming is the right one. I will also give you my views on why short-form programs are deserving of primary educational credit.

The current FCC standard requires that the program be "specifically designed" to serve either the intellectual needs or social needs of children 16 and under. In my opinion, this standard is concrete enough to guide broadcasters in fulfilling their responsibilities under the Children's Act, and at the same time flexible enough to allow producers and broadcasters the freedom to respond in creative and diverse ways to the programming challenge. On the other hand, I believe that the alternative definition that the Commission proposed in its Notice of Inquiry - that a program must have education as a "primary objective" with entertainment as a "secondary goal" would undermine the goals of creativity and diversity.

Children's Television Workshop put the issue very well in its written comments last year: effective educational programming must first reach before it can teach. If a program is lacking in entertainment value, not enough children will watch to attract the advertising revenue necessary for commercial survival. And it is not just a matter of money. A program is not effective in teaching

unless children are attentive to what they are watching. Children pay more attention when their emotions are engaged by strong characters, good stories and the utilization of entertainment techniques such as music, sound effects and eye-catching graphics.

A standard that allows for the use of entertainment techniques will not open the floodgates to entertainment programs that merely tack on a pro-social message. Under the current standard, a program must be "specifically designed" to serve an educational need. To me, that means the broadcaster must be able to demonstrate that the program had a clearly articulated plan to achieve an educational goal. The Commission can test the broadcaster's good faith by asking what the educational plan is and what steps were taken to ensure it is carried out.

There are many ways that can be done. At Capital Cities/ABC, we assign a Broadcast Standards director and editor to work with every children's program producer. The director has a doctorate in child psychology and years of hands-on experience with programming. The editor has 10 years of teaching experience. Before any educational show goes into production, our Broadcast Standards director and editor meet with the producer to define the educational goals and to establish how they will be implemented. From time to time, we also call upon outside educational consultants to work with us in both planning and production. The process that we engage in meets the "specifically designed" test. A broadcaster who merely came up with a new description for a recycled entertainment program would fail the "specifically

designed" test.

To my way of thinking, the "specifically designed" test is a much more objective standard than is the "primary purpose" test. It can be enforced by the Commission without second-guessing broadcaster program judgments. On the other hand, the "primary purpose" standard would be entirely subjective. The Commission would find itself screening programs to decide whether the educational content is enough to make it "primary" or whether the entertainment component is too significant. That kind of decision-making would necessarily raise serious concerns of improper government oversight.

There is another criticism of the current FCC standard that I would like to discuss briefly. Some critics say that serving children's social or emotional needs is not really educational. They would have the FCC narrow the definition so that only instructional programs would qualify. They say that broadcasters can slap the pro-social label on any program that is vaguely beneficial. Even if a pro-social standard is capable of abuse at the margin, it does not follow that bona fide programs that teach values or coping skills lack significant educational merit. The American Academy of Pediatrics has said that efforts to promote pro-social behavior in children are essential. We agree. There are many examples of legitimate pro-social programs that deserve educational credit. Perhaps the best known is the ABC Afterschool Special series. This coming season one episode, "Boys will be Boys", will deal with sexual harassment in a high school setting.

Another program, "Girlfriend", tells the story of a friendship that comes under the strain of racial differences. Other programs will deal with teenagers coping with lack of self esteem, with weight problems and with issues such as step-parenting and couple violence. I don't think anyone who has seen our Afterschool Specials would quarrel with their entitlement to educational credit.

I would also like to touch on the subject of short-form programming. The Commission would propose to reduce the credit it now gives to short-form educational programming. I think that would be a mistake. The short-form has many advantages in serving children's educational needs. For one thing, the length of a short-form segment better matches the attention span of young children. We have previously submitted to the Commission the results of a study that demonstrates that point. Second, short-forms that are inserted in high-rated entertainment programs reach more children than standard length educational programs. Finally, short-forms can be a very effective educational tool. ABC Schoolhouse Rock is a very good example.

Schoolhouse Rock is a series of three-minute programs which originally ran on ABC from 1973 until 1985. The segments make learning fun by mixing music and rhyme with history, science, mathematics and grammar. A recent study shows that college students who were exposed to the Schoolhouse Rock history segment, Preamble Rock, when they were children still have strong verbatim recall of the text of the Preamble to the Constitution. The many

letters we have received confirm that college-age kids not only loved Schoolhouse Rock but still remember the lessons it taught. In the film, "Reality Bites" there is a scene in which college graduates in caps and gowns sing a few lines of Conjunction Junction, a Schoolhouse Rock grammar segment, which teaches that part of speech. A few years ago we decided to bow to popular demand and return Schoolhouse Rock to our children's Saturday morning schedule. It has been on the schedule ever since. This year, we produced new episodes completing the Grammar Rock category with songs on prepositions and subject/predicate. We've started a new category known as "Money Rock" that will instruct children on money and financial matters. One segment will show the song "Dollars and Sense" that delineates between interest earned and interest paid. We also have plans to do songs on taxes, the national debt and the deficit. By the way, Schoolhouse Rock is scheduled at the same time every week so that parents who want their children to watch it can easily find it.

To summarize my views, I believe that the FCC's current "specifically designed" test is the appropriate standard for deciding what should qualify as educational and that short-form programs are deserving of primary educational credit.